

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: :  
Felicia Owens : Bankruptcy No.: 18-16627-AMC  
35 Dewey Road : Chapter 13  
Cheltenham, PA 19012 :  
Debtor :

**ANSWER TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY**  
**TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:**

And now Comes Felicia Owens, by her attorney, Teresa Brady, Esquire, who answers the request for relief from the automatic stay and avers as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Denied. The debtor at all times was and is ready, able and willing to pay her car payments. She has paid, including the July 2019 payment, see attached Exhibit A.
9. Admitted.
10. Denied.
11. Admitted.
12. Denied. The debtor at all times was and is ready, able and willing to pay her car payments. She has paid, including the July 2019 payment, see attached Exhibit A.
13. Denied.
14. Denied. The debtor at all times was and is ready, able and willing to pay her car payments. She has paid, including the July 2019 payment, see attached Exhibit A.

***Affirmative Defense and New Matter***

15. Since Debtor is current, Debtor demands payment history from creditor on this account.

WHEREFORE, debtor requests that the motion for relief from automatic stay be denied.

Respectfully Submitted,  
/S/TeresaBrady,Esquire  
Teresa Brady, Esquire  
Attorney for Plaintiff  
210 East Girard Avenue  
Philadelphia, PA 19125  
Phone (215)-426-1020

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**CERTIFICATE OF SERVICE**

I, Teresa Brady, Esquire, attorney for Felicia Owens, hereby certify that a true and correct copy of the forgoing Answer was forwarded to the following by 1<sup>st</sup> Class U.S. Mail on July 21, 2019.

Office of the Clerk  
US Bankruptcy Court  
900 Market Street  
Suite 400  
Philadelphia, Pa 19107

Chapter 13 Trustee

US Trustee's Office

Debtor

Jason Brett Schwartz, Esquire  
Attorney for Movant  
1333 Race Street  
Philadelphia, PA 19107

/S/TeresaBrady,Esquire  
Teresa Brady, Esquire #57587  
210 East Girard Avenue  
Philadelphia, PA 19125  
(215) 426-1020

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Felicia Owens	:	Bankruptcy No.: 18-16627-AMC
35 Dewey Road	:	Chapter 13
Cheltenham, PA 19012	:	
Debtor	:	

**JUDGE'S ORDER**

AND NOW this \_\_\_\_\_ day of \_\_\_\_\_, 2019,  
upon consideration of the Answer to the Motion of Movant for Relief from the Automatic  
Stay, Bankruptcy Code Section 362, and notice and opportunity for the hearing thereon, it  
is hereby

ORDERED, that the Motion be, and the same is hereby DENIED, and the  
Automatic Stay of 11 U.S.C. §362 (a) remains in place.

**BY THE COURT:**

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J.

# Exhibit A

**Date Range****Document** Page 5 of 5

Past 12 months

Jul 12, 2018 and future

**Filter By**

Showing 1 - 49 of 49 payments

page 1

Withdraw On	Description	Category	Amount	Deliver By	Status
6-28-19	Capital One Auto Finance *0111	Automobile Loan	\$225.00 *9792	6-28-19	Canceled Cfm # P7TH6-4N816
When Check Cashed	Capital One Auto Finance *0111	Automobile Loan	\$225.00 *9792	5-15-19	Processed Cfm # P2RYB-8J049
When Check Cashed	Capital One Auto Finance *0111	Automobile Loan	\$225.00 *9792	4-30-19	Processed Cfm # NZHT4-XXN1C
When Check Cashed	Capital One Auto Finance *0111	Automobile Loan	\$450.00 *9792	4-15-19	Processed Cfm # NZHT2-66FF4
When Check Cashed	Capital One Auto Finance *0111	Automobile Loan	\$225.00 *9792	3-29-19	Processed Cfm # NYJ07-CYHGJ
When Check Cashed	Capital One Auto Finance *0111	Automobile Loan	\$250.00 *9792	3-19-19	Processed Cfm # NX7WC-NXBY6
When Check Cashed	Capital One Auto Finance *0111	Automobile Loan	\$225.00 *9792	2-15-19	Processed Cfm # NSVT9-DVMLH
1-31-19	Capital One Auto Finance *0111	Automobile Loan	\$200.00 *9792	1-31-19	Canceled Cfm # NN8KK-2J7VP
When Check Cashed	Capital One Auto Finance *0111	Automobile Loan	\$225.00 *9792	1-15-19	Processed Cfm # NN8KJ-KLY9G
12-31-18	Capital One Auto Finance *0111	Automobile Loan	\$450.00 *9792	12-31-18	Canceled Cfm # NM4K7-FCYDR
When Check Cashed	Capital One Auto Finance *0111	Automobile Loan	\$200.00 *9792	12-31-18	Processed Cfm # NMKDY-1F2RQ
When Check Cashed	Capital One Auto Finance *0111	Automobile Loan	\$250.00 *9792	12-5-18	Processed Cfm # NKBC1-GQWMS

**Total** \$20,261.49 Pending, Processing, and Processed payments only, including any fees